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*Attorneys for Defendant  
Michael Richard Lynch*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
vs.  
  
MICHAEL RICHARD LYNCH and  
STEPHEN KEITH CHAMBERLAIN,  
  
Defendants.

Case No.: 3:18-cr-00577-CRB

Judge: Hon. Charles Breyer

**DECLARATION OF NICHOLAS P.  
SILVERMAN IN SUPPORT OF  
DEFENDANT MICHAEL RICHARD  
LYNCH'S MOTION *IN LIMINE* TO  
EXCLUDE CUMULATIVE TESTIMONY**

Court: Courtroom 6 – 17<sup>th</sup> Floor  
Date Filed: April 27, 2024  
Trial Date: March 18, 2024

**DECLARATION OF NICHOLAS P. SILVERMAN**

I, Nicholas P. Silverman, declare as follows:

1. I am an attorney licensed to practice law in the District of Columbia and a partner at the law firm of Steptoe LLP, counsel for the defendant Michael Richard Lynch. I have been admitted pro hac vice to appear in this action.

2. I have knowledge of the facts set forth herein, and if called upon as a witness to testify thereto, I could do so competently under oath.

3. Attached hereto as Exhibit A is a true and correct copy of an email from Adam Reeves to Counsel for Antonia Anderson dated April 7, 2024.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed April 27, 2024 in Washington, D.C.

/s/ Nicholas P. Silverman  
Nicholas P. Silverman